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May 9, 2022

**Via ECF**

Hon. Thomas J. McAvoy  
Senior U.S. District Judge  
Federal Building & U.S Courthouse  
15 Henry Street  
Binghamton, NY 13901

Re: United States v. Delaney  
1:20-CR-000335-TJM  
*Request to Seal Certain Portions of Letter Motion for Bail Pending Appeal*

Dear Judge McAvoy,

I represent the defendant, Jacob Delaney, in the above matter. Today I am filing a letter motion requesting the court grant Jacob bail pending appeal pursuant to 18 U.S.C. Section 3143(b). In that motion, I reference portions of the court's sealed decision and order, Docket Number 63. As a result, I have redacted those portions and move to file them under seal. I make this motion pursuant to FRCP 49.1(e) and Local Rule of Criminal Procedure 49.2(b) and *Lugasch v. Pyramid of Onondaga County*, 435 F. 3d 110, 119-27.

Unredacted copies of the same will be sent confidentially to chambers and the Government by email.

Thank you for your attention to this matter.

Respectfully,

Iseman PLLC

By:



Scott Iseman  
Attorney

cc: All parties via ECF